

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

| | | |
|--------------------------------|----------|--------------------------------|
| JOSEPH DENNIS CATANESE, | : | Chapter 13 |
| CATHY LOUISE CATANESE, | : | |
| | : | |
| Debtors | : | Bankruptcy No. 14-11963 |

ABS REO TRUST

Movant

v.

JOSEPH DENNIS CATANESE,
CATHY LOUISE CATANESE,

Respondents

**DEBTOR'S ANSWER TO THE MOTION OF SELECT PORTFOLIO
SERVICING, INC FOR RELIEF FROM AUTOMATIC STAY UNDER 11 U.S.C.
§362(d) PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001**

COMES NOW, the Debtors, Joseph and Cathy Catanese, by and through their attorney, Joseph T. Bambrick, Jr., who respectfully files this Answer to the Motion of Select Portfolio Servicing, Inc. for Relief From Automatic Stay Under §362 Pursuant to Bankruptcy Procedure Rule 4001 and in support thereof says:

1. Admitted.
2. Admitted. This is a legal conclusion. No answer required.
3. Denied. This is a legal conclusion. No answer required.
4. Denied. This is a legal conclusion. In addition this is legal argument.
5. Admitted.

6. Admitted. This is a legal conclusion.
7. Denied. See attached Exhibit A
8. Denied. The debtors herein incorporate their answer in 7 above as if set out in detail herein.
9. Denied. The debtors herein incorporate their answer in 7 & 8 above as if set out in detail herein.
10. Denied
11. Denied. This is legal argument. No answer required.

WHEREFORE, for all the above reasons, the Debtors, Joseph and Cathy Catanese, respectfully prays this Honorable Court to:

- A. Deny the Motion of the creditor with prejudice; and
- B. Grant such other relief that this Court deems fitting and just.

NEW MATTER

12. The Debtors herein incorporate their answer in 1-11 as if set out in detail herein.
13. The Debtors herein incorporate their answers in 7-10 above as if set out in detail herein.
14. The Debtors in fact have made all required mortgage payments pursuant to the original mortgage agreement, see attached Exhibit A.

WHEREFORE, for all the above reasons, the Debtors, Joseph and Cathy Catanese, respectfully prays this Honorable Court to:

- A. Deny the Motion of the creditor with prejudice; and

B. Grant such other relief that this Court deems fitting and just.

Respectfully submitted by,

Dated: November 5, 2018

/s/Joseph Bambrick
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